

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO: 5:17-CR-303-1D

UNITED STATES OF AMERICA)	
)	
V.)	DEFENDANT'S MOTION TO EXTEND TIME
)	TO FILE PRETRIAL MOTIONS
MATTHEW YENSAN)	
Defendant)	
_____)	

NOW COMES defendant Matthew Lee Yensan, by and through his undersigned counsel, and moves this Court for an Order extending the time in which to file pretrial motions until November 17, 2017. The grounds for this motion are as follows:

1. On October 3, 2017, Defendant is charged with possession with intent to distribute a quantity of marijuana in violation of 21 U.S.C. Sect. 841(a); possess with the intent to distribute a quantity of Alprazola in violation of 21 U.S.C. Sect. 841(a)(1); intentionally distribute a Schedule IV controlled substance, Alprazolam, by means of the Internet in violation of 21 U.S.C. Sect. 841(h); and possess firearms in furtherance of a drug trafficking crime in violation of 18 U.S.C. Sect. 924 (c)(1)(A)(i). [DE 17].
2. Undersigned counsel filed her Notice of Appearance in this matter October 21, 2017. [DE 21] Undersigned counsel received discovery materials later that week, but was not able to obtain the encryption password until on or about October 30, 2017. The pretrial motions deadline is presently scheduled for November 7, 2017. [DE 20].

3. Defense counsel requires additional time to review the discovery, to meet and consult with the defendant, and to investigate the circumstances surrounding the charges in this case. Accordingly, defense counsel respectfully requests that the pretrial motions deadline be extended through and including November 17, 2017 with responses due December 1, 2017.
4. Special Assistant United States Attorney Benjamin Zellinger has confirmed that the Government does not oppose this motion.
5. This Motion is made in good faith and not for purposes of delay. Neither the Government nor the defendant would be prejudiced by the extension sought herein.

WHEREFORE, the Defendant, , respectfully requests that the pretrial motions deadline be extended until November 17, 2017 with responses due December 1, 2017.

Respectfully submitted this the 6th day of November, 2017.

/s/Rosemary Godwin
ROSEMARY GODWIN
Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Extend Time to File Pretrial Motions was duly served upon:

Benjamin Zellinger
Special Assistant United States Attorney
Suite 800, Federal Building
310 New Bern Avenue
Raleigh, NC 27601-1461

by electronically filing the foregoing with the Clerk of Court on the 6th day of November 2017, using the CM/ECF's system which will send notification of such filing to the above.

/s/Rosemary Godwin
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